

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

TODD SODERBERG, individually and as)	
father and next of friend of A.S., and on behalf)	
of all other persons similarly situated,)	
)	
Plaintiffs,)	Civil Action No. 3:17-CV-30057-MGM
)	
v.)	
)	
PROGRESSIVE DIRECT INSURANCE)	
COMPANY.,)	
)	
Defendant.)	

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the parties, through their undersigned counsel, hereby stipulate that all claims by Plaintiffs Todd Soderberg and A.S. against Progressive Direct Insurance Company in this action are dismissed with prejudice, with Plaintiffs and Defendant Progressive Direct Insurance Company to each bear their own costs and attorneys' fees.

Dated: January 19, 2021

Respectfully submitted,

/s/ Jeffrey S. Morneau

Jeffrey S. Morneau, Esq. (BBO# 643668)
Connor, Morneau & Olin, LLP
273 State Street
Springfield, Massachusetts 01103
Tel: (413) 455-1730
Fax: (413) 455-1594
jmorneau@cmolawyers.com

/s/Laura D. Mangini, Esq.

Laura D. Mangini, Esq.(BBO# 684620)
Robert A. DiTusa, Esq. (BBO# 649218)
Ryan E. Alekman, Esq. (BBO# 636916)
Alekman DiTusa, LLC
1550 Main Street, Suite 401
Springfield, Massachusetts, 01103
Tel: (413) 781-0000
Fax: (413) 827-0266
laura@alekmanditusa.com
robert@alekmanditusa.com
ryan@alekmanditusa.com

Attorneys for Plaintiff

/s/ Zachary A. McEntyre

Zachary A. McEntyre (admitted *pro hac vice*)
KING SPALDING LLP
1180 Peachtree Street NE
Atlanta, GA 30309
Telephone: 404-572-3499
zmcentyre@kslaw.com

Julia C. Barrett (admitted *pro hac vice*)
KING & SPALDING LLP
500 W. 2nd Street, Suite 1800
Austin, Tx 78701
Telephone: 512-457-2052
jbarrett@kslaw.com

Attorneys for Defendant Direct Insurance Company